

### **REMARKS/ARGUMENTS**

This Reply is in response to the Office Action mailed October 26, 2010. Before this Reply, claims 32-42, 44-45, 48, 50-52, 56, 59-60, and 65-68 were pending. In this Reply, no claims have been amended, canceled, or added. After entry of this Reply, which is respectfully requested, claims 32-42, 44-45, 48, 50-52, 56, 59-60, and 65-68 will still be pending. Because the claims have not been amended, this Reply does not raise new issues requiring further search and/or consideration. Reconsideration of the rejected claims is requested.

#### **Examiner Interview**

A telephone interview was conducted with Examiner Gofman on January 12, 2011. Patent agent Houtan Amanat and undersigned attorney represented the Applicants in the interview. In the interview, an overview of the claimed subject matter of claim 32 was presented, and the subject matter was contrasted with the teachings of the cited references. While no agreement was reached, the Examiner agreed to review the §103 rejections of the claims in light of the discussed differences between the subject matter of claim 32 and the cited prior art. Applicants wish to thank the Examiner for his time and careful consideration of the matters presented.

#### **Claim Rejections Under 35 U.S.C. § 103**

The Office Action has rejected claims 32-42, 44-45, 48, 50-52, 56, 59, 60 and 65-68 under 35 U.S.C. § 103(a) as being unpatentable over Lee (U.S. 2002/0129024) (hereinafter “Lee”) in view of Chung et al. (U.S. 6,850,947) (hereinafter “Chung”) and further in view of Micco et al (U.S. 2003/0056203) (hereinafter “Micco”). These rejections are respectfully traversed.

To establish a prima facie case of obviousness, the prior art reference, or references when combined, must teach or suggest all of the claim limitations. Applicants respectfully traverse the rejections because the cited references fail to teach or suggest all of the claim limitations.

For example, independent claim 32 recites:

A method of transforming data, the method comprising:  
**positioning a definition pointer to point at a first compound transform definition within a transform definition file;**  
invoking a first parallel processing thread to read the pointed at first compound transform definition;  
searching data to be transformed for a data element to be transformed, the search being responsive to the first compound transform definition;  
**calling a dynamic function defined in the transform definition file, the dynamic function located elsewhere in the transform definition file from the definition pointer position;**  
**transforming any found data element into an output data file, responsive to the first compound transform definition and called dynamic function, a data structure of the output data file being responsive to a data structure of the first compound transform definition;**  
positioning a definition pointer to point at a second compound transform definition within the transform definition file;  
invoking a second parallel processing thread to read the pointed at second compound transform definition;  
searching data to be transformed for another data element to be transformed, the search being responsive to the second compound transform definition; and  
transforming any found data element into the output data file, responsive to the second compound transform definition, the data structure of the output data file being responsive to the data structure of the second compound transform definition.

(emphasis added). Independent claims 44, 59, and 65 recite similar limitations.

The Office Action alleges that Micco explicitly discloses the dynamic function located elsewhere in the transform definition file from the definition pointer position at paragraph 19 (Office Action: p.3). Applicants respectfully disagree.

Applicants respectfully assert that Micco fails to teach or suggest “calling a dynamic function defined in the transform definition file, the dynamic function located elsewhere in the transform definition file from the definition pointer position” as recited in claim 32. Nowhere does Micco teach or suggest the dynamic function located elsewhere in the transform definition file from the definition pointer position.

Micco is directed to using description information about a function to translate a call to the function into a call to a corresponding function in a second language. Micco discloses processing a definition of a function associated with a first language to create description information sufficient to enable translation of a call to the function into a call to a corresponding

function in a second language without requiring processing of the definition of the function. For example, if a source language program written in the MATLAB programming language contains multiple MATLAB function calls to a function f2, instead of the translator processing the source language code definition for function f2 to derive all the information (e.g., the declared number of formal inputs and outputs to function f2, the scope of function f2, the use of certain language features, such as variable argument lists or the nargin function) needed to generate a C-function call to the function f2, description information for f2 function is created, stored in a library description file, and used to translate multiple calls to the function f2 from MATLAB to C without requiring processing of the definition of the function f2.

The section of Micco cited by the Office Action merely describes a library generation process having multiple library description files in which description information of a function is stored. In Micco, the library generation process processes each source language function in a library source file contains definition of a function in a source language code by: (1) **examining** the source language **function** as it is called (step 204); (2) **deriving information about** the source language **function** that would enable the appropriate target language function call selection to be made (step 206); and (3) **using the derived information to translate** the source language function **call into a** corresponding target language function **call** (step 208). However, Micco's cited section does not describe any specific function call to be included with a function definition of the called function in the same file.

The Office Action avers that "Micco [0019] discloses finding an appropriate 'language function in the library source file' and 'using the derived information to translate the source language function call into a corresponding target language function call.' This means that the call to translate a function as well as the translation function is located in the same file" (Office Action: p.4). However, Micco's call to translate a function (e.g., function f2) coming from source file 104 does not reside in the **same file** as a translation function definition that resides in the library generation process 112 as disclosed by the cited section of Micco.

In addition, none of the source files, target files, library description files, or the library source files have both function calls to a specific function and the specific called function definition within them. Therefore, Micco fails to teach or suggest that the "dynamic function

located elsewhere in the transform definition file from the definition pointer position” as alleged by the Office Action.

The Office Action further avers that Lee teaches “positioning a definition pointer to point at a first compound transform definition within a transform definition file” at paragraph [0321] (Office Action: p.4). Applicants respectfully disagree.

Lee discloses that an Identity System receives a user request and identifies all the programs and XML templates for each identified program required to complete the request. The Identity System organizes their results into a single data structure, based on the templates results for each program. The Identity System then transforms the data structure into a single Output XML containing attributes and their display characteristics. The Output XML can be provided directly to the user or receive further processing using the XSL stylesheets.

As can be seen, Lee does not disclose a transform definition **file**. Instead, Lee relies on XML templates of each program identified to complete the search and then prepares a data structure which combines the XML templates from each program to form a single data structure to provide a single response to a request instead of a response for each program in the request. Since Lee does not disclose a transformation definition file, naturally Lee would fail to teach or suggest a definition pointer within the transformation definition file.

The Office Action also avers that Lee teaches “transforming any found data element into an output data file, responsive to the first compound transform definition and called dynamic function, a data structure of the output data file being responsive to a data structure of the transform process definition first compound transform definition” at paragraphs [0321], [0323], and [0239] (Office Action: p.4). Applicants respectfully disagree.

Lee merely combines and displays all data elements (results) in a single output XML file with attributes and display characteristics without having a transformation definition for each data element, whereas in the claimed transformation, each transformation definition result is **individually** transformed based on a specific and unique value and structure transformation as defined by the transformation definition. Accordingly, Lee fails to teach or suggest “transforming ... responsive to the first compound transform definition and called

dynamic function, a data structure of the output data file being responsive to a data structure of the transform process definition first compound transform definition” as recited in claim 32.

Chung fails to cure the deficiencies of Lee and Micco. Because neither Lee, Chung nor Micco teach or suggest each limitation in the claims, no combination of the references can render the claims unpatentable under § 103. For at least the above reasons, Applicants respectfully request withdrawal of the rejections of the claims and all claims depending therefrom.

#### **Amendment to the Claims**

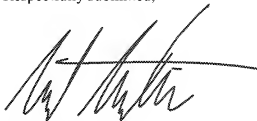
Unless otherwise specified or addressed in the remarks section, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter. In addition, by focusing on specific claims and claim elements in the discussion above, applicants do not imply that other claim elements are disclosed or suggested by the references. In addition, any characterizations of claims and/or cited art are being made to facilitate expeditious prosecution of this application. Applicants reserve the right to pursue at a later date any other broader or narrower claims that capture any subject matter supported by the present disclosure, including subject matter found to be specifically disclaimed herein or by another prosecution. Accordingly, reviewers of this or any child or related prosecution history shall not reasonably infer that applicants have made any disclaimers or disavowals of any subject matter supported by the present disclosure.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark Mathison', with a long horizontal stroke extending to the right.

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